

RE: "Violent Television Programming and its Impact on Children"
Docket 04-261

Ladies and Gentlemen of the FCC:

This letter is intended to contribute to your ongoing investigation regarding the issue of violence in television and its effect on children. Your investigation is evidence that parents seek greater assistance in evaluating and filtering media for their children. The undersigned agree and believe that the new technological capability of digital cable, satellite, and digital broadcast can enable parents to control their own children's exposure to violence without infringing on anyone's rights to free speech. Better information and tools make legislative restrictions on expression unnecessary.

Better Tools to Support Family Choice

Research shows that parents will embrace a solution that provides 1) quality, unbiased information about program contents so that they can make well-informed choices for their children, and 2) the technical means to implement those choices quickly and easily. Three elements are essential to a truly effective media management solution: quality, unbiased information, a control mechanism that is easy to use, and consumer awareness. The existing V-Chip program has laid the foundation for the solution. However, the evolution of the media landscape – in both content and technology – requires and supports an evolution in the V-Chip to meet the needs of US families.

The CMS Solution

Convergent Media Solutions (CMS) has developed Parents TV Zone – a "next generation V-chip" that improves greatly on the current system. With Parents TV Zone families can, in effect, create a personal a la carte service that meets individual needs, interest and values by filtering the program guide for the child according to the parent's personal tastes and values. Parents TV Zone provides:

Quality Information from a Neutral Independent Third Party
Much like food labels, Parents TV Zone provides in-depth summaries of program attributes that are most relevant to children -- positive and negative. Parents TV Zone program information is consistent and reliable because it is based on published standards, many of which have been developed by leading education and health organizations in the US. We believe the Parents TV Zone information is a vast improvement over the existing Parental Guidelines given its consistency, granularity, and objectivity.

Ease-of-use

Parents TV Zone can stand alone as a virtual channel, it can be integrated into the program guide, or it can be a separate menu item on interactive television systems. Program content summaries are available on-demand. Parents can make age-based program selections by simply choosing a viewing level, or choose from a menu of options for more granular control of specific content attributes.

Aggressive promotion

Low usage rates for the V-Chip are not surprising. Few people know about it because there is no entity that has an economic incentive to promote it. As a for-profit entity, Convergent Media Solutions has a vested interest in generating as much use and awareness as possible among its primary end-users: parents.

Summary of Advantages

Parents TV Zone is a superior solution for enabling parents to

manage their children's TV and media consumption. The attached description provides more detail about the Parents TV Zone, in addition to these key points:

- Enables parents to, in effect, create customized a la carte service on program-by-program basis that meets and reflects personal needs, interests, and values.
- Meets the need of 80% of parents who seek the tools and content descriptions to choose media for their children (according to Kaiser Family Foundation Research).
- Extends to other forms of media consumed by children via the TV including video games, movies, and music.
- Reaches the 50% of US TV households that subscribe to digital cable, satellite, or digital broadcast, and grows with the penetration of digital transmission.
- Avoids new hardware, components, or manufacturing that increases television manufacturers' UPC (as did the V-Chip) given that it is a software solution.
- Covers broadcast and cable programming equally, unlike much of the legislation proposed around the issue of violence and indecency. To the 87% of US Households that subscribe to cable or DBS, the lines between broadcast and cable programming are fuzzy at best.
- Supports current parental controls and media ratings (TV Ratings, MPAA), as well as other rating or review systems proffered by other independent organizations in the future

Offering Parents TV Zone to US Families

Based on our experience, the satellite TV providers appear interested in offering such a product on a subscription basis.

We would welcome the opportunity to demonstrate the product for you in person so that your deliberations going forward are informed by all of the available options for addressing the pressing needs of children and families.

The undersigned appreciates your dogged pursuit of a solution that meets the needs of American families and children. I can be reached at tel. (508) 785-0792 if you have any questions or require additional information.

Sincerely,

Daniel P. Miles

Convergent Media Solutions – providers of Parents TV Zone